

Avant Building - Suite 900 | 200 Delaware Avenue | Buffalo, NY 14202-2107 | [bsk.com](http://bsk.com)

VIA ECF

## MEMO ENDORSED

April 14, 2020

JEREMY P. OCZEK  
[jpoczek@bsk.com](mailto:jpoczek@bsk.com)  
P: 716.416.7037

Honorable Edgardo Ramos  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 619  
New York, NY 10007

**Re: Signify North America Corporation et al. v. Reggiani Lighting USA et al.**  
**Civil No. 1:18-cv-11098-ER**

Dear Judge Ramos:

We are counsel for Plaintiffs Signify North America Corporation and Signify Holding B.V. (collectively, "Signify") in the above-captioned action. Signify respectfully submits this letter in response to the letter submitted by Defendants Reggiani Lighting USA, Inc., and Reggiani S.p.A. Illuminazione (collectively, "Reggiani") on April 13, 2020, as directed by the Court.

Signify, as a global company with operations around the world, including in Italy and the United States, is certainly sympathetic and understanding of the tremendous impact the Covid-19 pandemic has had on businesses and global markets. Signify understands that the Covid-19 pandemic is unprecedented in its scale and the challenges it presents. Signify has itself experienced the impact of the pandemic and has taken cost-cutting moves in view of the current environment, e.g., the company has recently requested a 20% wage concession from employees in addition to other cost-cutting measures. While Reggiani has proposed that the Scheduling Conference be set in September, Signify respectfully notes that would keep the case on hold for another five months (the case was filed in November 2018). Signify respectfully suggests that the Court keep the telephonic conference currently set for tomorrow, April 15, at 10:30 AM so that the Court and parties can discuss together efficiently and in real-time how to best proceed in this case and discuss an appropriate time to set the Scheduling Conference.

Thank you for your consideration.

Respectfully submitted,

s/ Jeremy P. Oczek

Jeremy P. Oczek

cc: Counsel of Record (via ECF)

The telephonic conference scheduled for tomorrow, April 15, 2020 at 10:30 AM will proceed. The parties are directed to call (877) 411-9748; access code 3029857.



Edgardo Ramos, U.S.D.J

Dated: April 14, 2020

New York, New York